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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC Item 2.2.01.09 [Index Number 110]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.09 [Index Number 110]. This ITAAC confirms that safety related displays and controls exist in the main control room, including controls from PMS, for valves associated with the Containment System (CNS) identified as having active safety functions. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," which is endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,



Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC Item 2.2.01.09 [Index Number 110]

JMC/PCM/sfr

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cc: Regional Administrator, Region II
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

**Southern Nuclear Operating Company
ND-23-0307
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC Item 2.2.01.09 [Index Number 110]**

ITAAC Statement

Design Commitment

9. Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.

10.a) Controls exist in the MCR to cause those remotely operated valves identified in Table 2.2.1-1 to perform active functions.

10.b) The valves identified in Table 2.2.1-1 as having PMS control perform an active safety function after receiving a signal from the PMS.

Inspections, Test, Analyses

Inspection will be performed for retrievability of the safety-related displays in the MCR.

Stroke testing will be performed on remotely operated valves identified in Table 2.2.1-1 using the controls in the MCR.

Testing will be performed on remotely operated valves listed in Table 2.2.1-1 using real or simulated signals into the PMS.

Acceptance Criteria

Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.

Controls in the MCR operate to cause remotely operated valves identified in Table 2.2.1-1 to perform active safety functions.

The remotely operated valves identified in Table 2.2.1-1 as having PMS control perform the active function identified in the table after receiving a signal from PMS.

ITAAC Determination Basis

Inspections and testing were performed to confirm the valves listed in Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) have safety related displays retrievable in the Main Control Room (MCR), controls exist in the MCR to cause those remotely operated valves identified in Table 2.2.1-1 to perform active functions, and the valves identified as having Protection and Safety Monitoring System (PMS) control perform the active function identified in the table after receiving a signal from the PMS.

Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.

Inspections were performed as described in the Unit 4 ITAAC Technical Report (Reference 1) which visually confirmed that when each of the displays of the plant parameter identified in Attachment A is summoned using the MCR PMS Visual Display Units (VDUs), the expected valve position appears on the PMS VDU.

Controls in the MCR operate to cause remotely operated valves identified in Table 2.2.1-1 to perform active safety functions.

Using Plant Control System (PLS) controls in the MCR, stroke testing each valve in Attachment A was performed in accordance with test package work orders for Unit 4 listed in Reference 2. Each valve was stroked to its active function and proper valve position indication was verified locally and in the MCR. This testing demonstrates PLS controls in the MCR operate to cause the remotely operated valves identified in COL Appendix C Table 2.2.1-1 to perform their active safety functions.

The remotely operated valves identified in Table 2.2.1-1 as having PMS control perform the active function identified in the table after receiving a signal from PMS.

Testing is performed in accordance with Unit 4 test package work orders listed in Reference 3 to confirm that the remotely operated valves identified in Attachment A as having PMS control perform the active safety function identified in the table after receiving a signal from the PMS.

The test package work orders establish initial conditions for each valve, verified locally and in the MCR to be in the open position. An actuation signal is generated by PMS using the PMS Maintenance and Test Panel (MTP) to generate a signal to close the valves in Attachment A. Each valve is verified locally and in the MCR to be closed. Additionally, for VFS-PL-V800A/B initial conditions were established with each valve verified locally and in the MCR to be in the closed position. An actuation signal is generated by PMS using the PMS Maintenance and Test Panel (MTP) to generate a signal to open the valves. VFS-PL-V800A/B are verified locally and in the MCR to be open. This verifies that the remotely operated valves identified in Table 2.2.2-1 as having PMS control perform the active safety function identified in the table after receiving a signal from the PMS.

Together, these test results (References 1 through 3) provide evidence that the ITAAC Acceptance Criteria requirements are met:

- Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.
- Controls in the MCR operate to cause remotely operated valves identified in Table 2.2.1-1 to perform active safety functions.
- The remotely operated valves identified in Table 2.2.1-1 as having PMS control perform the active function identified in the table after receiving a signal from PMS.

References 1 through 3 are available for NRC inspection as part of the Unit 4 ITAAC 2.2.01.09 Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.01.09 Unit 4 (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.01.09 was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-CNS-ITR-800110, Rev 0, "Unit 4 Inspection Results of: ITAAC 2.2.01.09 (Item 9), NRC Index Number:110"
2. SV4-CNS-ITR-801110, Rev 0, "Unit 4 Testing Results of ITAAC 2.2.01.09 (Item 10.a), NRC Index Number:110"
3. SV4-CNS-ITR-802110, Rev 0, "Unit 4 Testing Results of Containment Isolation Valves ITAAC 2.2.01.09 (Item 10.b), NRC Index Number 110"
4. 2.2.01.09-U4-CP-Rev0, ITAAC Completion Package

Attachment A

Containment System (CNS) Remotely Operated Valves Display, Control, and Active Function

Equipment Name*	Tag No.*	Remotely Operated Valve*	Safety- Related Display*	Control PMS/DAS*	Active Function*
Instrument Air Supply Outside Containment Isolation Valve	CAS-PL-V014	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	YES	Yes (Valve Position)	Yes/No	Transfer Closed
CCS containment isolation MOV-outlet line IRC	CCS-PL-V207	YES	Yes (Valve Position)	Yes/No	Transfer Closed
CCS containment isolation MOV-outlet line ORC	CCS-PL-V208	YES	Yes (Valve Position)	Yes/No	Transfer Closed
SFS Discharge Line containment isolation MOV - ORC	SFS-PL-V038	YES	Yes (Valve Position)	Yes/No	Transfer Closed
SFS Suction Line containment isolation MOV - IRC	SFS-PL-V034	YES	Yes (Valve Position)	Yes/No	Transfer Closed
SFS Suction Line containment isolation MOV - ORC	SFS-PL-V035	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Containment Purge Inlet containment isolation valve -ORC	VFS-PL-V003	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Containment Purge Inlet containment isolation valve - IRC	VFS-PL-V004	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Containment Purge Discharge containment isolation valve - IRC	VFS-PL-V009	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Containment Purge Discharge containment isolation valve -ORC	VFS-PL-V010	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Vacuum Relief containment isolation A MOV - ORC	VFS-PL-V800A	YES	Yes (Valve Position)	Yes/No	Transfer Closed/ Transfer Open
Vacuum Relief containment isolation B MOV - ORC	VFS-PL-V800B	YES	Yes (Valve Position)	Yes/No	Transfer Closed/ Transfer Open
Fan Cooler Return containment isolation valve - IRC	VWS-PL-V082	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Fan Cooler Return containment isolation valve - ORC	VWS-PL-V086	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Fan Cooler Supply containment isolation valve - ORC	VWS-PL-V058	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Reactor Coolant Drain Tank (RCDT) Gas Outlet containment isolation valve - IRC	WLS-PL-V067	YES	Yes (Valve Position)	Yes/No	Transfer Closed
RCDT Gas Outlet containment isolation valve - ORC	WLS-PL-V068	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Sump Discharge containment isolation valve - IRC	WLS-PL-V055	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Sump Discharge containment isolation valve - ORC	WLS-PL-V057	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed

*Excerpt from COL Appendix C Table 2.2.1-1